

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
Juel Roundtree

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2015 NOV 20 PM 3:27

(In the space above enter the full name(s) of the plaintiff(s).)

-against-

NYC , Securis, NYC Treasurer, Corizon Med.

**AMENDED
COMPLAINT**

under the Civil Rights Act,
42 U.S.C. § 1983

Jury Trial: Yes No
(check one)

15 Civ. 6582 (LAP)

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

USDC SDNY
DOCUMENT
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DOC #:
DATE FILED: <u>11/20/15</u>

I. Parties in this complaint:

- A. List your name, identification number, and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff's Name Juel Roundtree
ID# 349 150 5881
Current Institution O-RVC
Address 09-09 Hazen st.
Elmhurst, N.Y. 11370

- B. List all defendants' names, positions, places of employment, and the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1 Name NYC Shield # _____
Where Currently Employed _____
Address _____

Defendant No. 2

Name Securis

Shield # _____

Where Currently Employed _____

Address _____

Defendant No. 3

Name NYC Treasurer

Shield # _____

Where Currently Employed _____

Address _____

Who did what?

Defendant No. 4

Name John Doe (Former phone companies)

Shield # _____

Where Currently Employed _____

Address _____

Defendant No. 5

Name Corizon Medical

Shield # _____

Where Currently Employed _____

Address _____

II. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. In what institution did the events giving rise to your claim(s) occur?

NYC & Riker's Island

B. Where in the institution did the events giving rise to your claim(s) occur?

C. What date and approximate time did the events giving rise to your claim(s) occur?

I have bills I paid through a Nicole Daniels Sonata flat as ho, and myself, that were never returned. I had various payrolls for weeks at a time, that D.O.C. never paid me in CRVC, nor did they reduce my debts owed.

D. Facts: I have lost hundreds of calls, & was still charged. Phone calls charged for extended lengths of time where I was not even on the phone. For many years, I was interred on many misdemeanors, yet always strip searched Rev. 01/2010 but did not find out about the class action, so was denied redress. I have consistently been a victim of the R.I.T. for my claims unanswered. last time 2013.

What happened to you?

The only time I can say I was mirandized was for a kidnapping charge (M6100Q548 Arr.#), no other arrests have been mirandized. Under Robert "Morgenthau" and the current D.A., I am consistently charged way beyond what is fitting for my arrests, in a bid to force plea acceptance from me. Many of my cases, my right to testify before the "Grand Jury" is waived without my permission, and the D.A.'s Office will manufacture indictment or merely lie and refuse to R.O.R. me on 180.80 dates. Even when they have proof of my innocence, they will deny my right to "due process of law". My last 3 cases, now included, the Manhattan D.A.'s Office has hidden witnesses in my favor, refuses to produce video evidence etc. As a matter of fact, my last time before the "Grand-Jury", the AD.A. deliberately lied about details in my previous trial to gain an indictment illegally. Many of my cases, start misdemeanors, and the D.A.'s Office distorts facts and add false statements etc. to the case to justify felony charges. I am also being "punished by bail" having latenesses to Court III. Injuries: being construed as warrants falsely. (continued on back of 3)

Was anyone else involved?

Who else saw what happened?

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received.

My reputation is virtually destroyed, my sense of worth, my pre-existing conditions go untreated due to sub-standard care and incarceration in D.O.C. D.O.C. does not answer my foul requests, preventing my redress. Securis and the other phone companies are always cheating me of phone calls, and or money, yet keeping a running tab with no corrections. These agencies, including the D.A.'s Ofc., and NYPD are agents of NYC, and have specific harms, pertaining to each agency afflicted against my person. Some of which,

IV. Exhaustion of Administrative Remedies: are egregious, others out right fraud.

The Prison Litigation Reform Act ("PLRA"), 42 U.S.C. § 1997e(a), requires that "[n]o action shall be brought with respect to prison conditions under section 1983 of this title, or any other Federal law, by a prisoner confined in any jail, prison, or other correctional facility until such administrative remedies as are available are exhausted." Administrative remedies are also known as grievance procedures.

A. Did your claim(s) arise while you were confined in a jail, prison, or other correctional facility?

Yes No _____

I have never been given a preliminary hearing, which is my right and have to refuse verbally on the record, yet have never even been told about these rights. Regardless of my injuries and poor health, I am being housed in a bldg. embroiled in a gang war, where even my age is an excuse for abuse by officers and prisoners. My property has continuously taken for safe-keeping (canes, knee braces, sneakers etc.), and I'm either not given a receipt, or the items are lost or stolen. I event sent in claims with copies of the receipts, and never received claim #'s, nor does there seem to be a record of the claims I sent in. There were also, several grievances sent in at C-73 (GMDC), but mysteriously there are no records ~~keep~~ sent in response to over 8 FOIL requests. They are simply ignoring and obfuscating my attempts at reperations. NYC, its agents, agencies, and or employees there in, on a regular basis seek to deprive individuals liberty, equality, constitutional and human right protections or status. Those in care of D.O.C., are systematically put in physical danger, by it's negligence, poor management and deliberate indifference, to their status, age, health, or needs. The Criminal court system, and especially NYPD, and the D.A.'s office go out of their way to illegal detain minorities, without mirandizing them, or charging them fairly... so as to deliberately, convince Judges to place astronomical bail, sometimes 100's of times what he or she can afford for trumped up street fights etc., with no real injuries. Legal Aid is allowed to waive detainees rights to "Grand Jury", by Judges, who also allow A.D.A.'s and D.A.'s in Manhattan, to lie, use deceptive tactics, and falsely claim people are indicted, when they are not. All these factors together poison the process, and are "cruel and unusual punishment", as well as a variety of other violations to my L.F.S.

If YES, name the jail, prison, or other correctional facility where you were confined at the time of the events giving rise to your claim(s).

GRVC, GMDC, 125 White St.

B. Does the jail, prison or other correctional facility where your claim(s) arose have a grievance procedure?

Yes No _____ Do Not Know _____

C. Does the grievance procedure at the jail, prison or other correctional facility where your claim(s) arose cover some or all of your claim(s)?

Yes No _____ Do Not Know _____

If YES, which claim(s)?

Loss of phone calls, owed payroll from D.O.C., lost or stolen property

D. Did you file a grievance in the jail, prison, or other correctional facility where your claim(s) arose?

Yes No _____

If NO, did you file a grievance about the events described in this complaint at any other jail, prison, or other correctional facility?

Yes _____ No _____

E. If you did file a grievance, about the events described in this complaint, where did you file the grievance?

In all the relevant locations, Pay owed (GRVC), loss of phone calls. (GMDC) lost & stolen property

1. Which claim(s) in this complaint did you grieve?

All that pertained to D.O.C.

2. What was the result, if any?

No result, told to write other agencies or they were ignored.

3. What steps, if any, did you take to appeal that decision? Describe all efforts to appeal to the highest level of the grievance process.

Don't Remember

F. If you did not file a grievance:

1. If there are any reasons why you did not file a grievance, state them here:

2. If you did not file a grievance but informed any officials of your claim, state who you informed, when and how, and their response, if any:

- G. Please set forth any additional information that is relevant to the exhaustion of your administrative remedies.

I have sent numerous complaints in letter form, to "prisoners rights", ACFU, the NAACP, the "Dept. of Investigation", Legal A.D, various judges and agencies including the "Inspector and Attorney General's Offices". I also joined the "Inmate-Council", and have sent fail requests to various agencies and have received almost no response, for the volume of fail requests.

Note: You may attach as exhibits to this complaint any documents related to the exhaustion of your administrative remedies.

V. Relief:

State what you want the Court to do for you (including the amount of monetary compensation, if any, that you are seeking and the basis for such amount). I would like my account debt at \$0. I am requesting the right of detainees being given "due process", including citizens being Mirandized, and advised of and being given preliminary hearings enforced. All agencies mentioned be held accountable for their numerous bad acts, negligences, & missteps, deliberate or otherwise. My last & stale items paid for, and whoever is responsible for answering "fail requests", who refused to do so fired. For being forced to live in fear, the embarrassment of being strip searched on camera, & at random, and for being housed in a dangerous bldg., not medical housing where I belong, forcing me to forego medical treatments to avoid gang-fights etc.) I am suing for \$5,000,000. My PTSD, Manic Depression and my physical ailments have been worsened 3X over.

VI. Previous lawsuits:**On these claims**

- A. Have you filed other lawsuits in state or federal court dealing with the same facts involved in this action?

Yes No _____

- B. If your answer to A is YES, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another sheet of paper, using the same format.)

1. Parties to the previous lawsuit:

Plaintiff Juel Roundtree
Defendants Corizon, NYC

2. Court (if federal court, name the district; if state court, name the county) _____
Southern Dist. Court

3. Docket or Index number _____

4. Name of Judge assigned to your case _____

5. Approximate date of filing lawsuit 10/6/15, Oct. 6, 2015

6. Is the case still pending? Yes No _____

If NO, give the approximate date of disposition _____

7. What was the result of the case? (For example: Was the case dismissed? Was there judgment in your favor? Was the case appealed?) _____

On other claims

- C. Have you filed other lawsuits in state or federal court otherwise relating to your imprisonment?

Yes No _____

- D. If your answer to C is YES, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same format.)

1. Parties to the previous lawsuit:

Plaintiff Juel Roundtree
Defendants Doe, NYC, Jane Doe, Jane Doe, John Doe, John Doe
2 Capt. (female) / 1 male capt. / 1 male (Dep. Warden)

2. Court (if federal court, name the district; if state court, name the county) _____
Southern Dist.

3. Docket or Index number 15 Civ 6583

4. Name of Judge assigned to your case J. Paul Oetken

5. Approximate date of filing lawsuit 8/3/15

6. Is the case still pending? Yes No _____
If NO, give the approximate date of disposition _____
7. What was the result of the case? (For example: Was the case dismissed? Was there judgment in your favor? Was the case appealed?)

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 2nd day of October NOV, 2015.

Signature of Plaintiff

Inmate Number

Institution Address

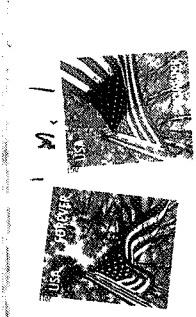
Guel Routhier
349 150 5881
(GRVC) 09-09 Hazen St,
E. Elmhurst, NY 11370

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint and provide their inmate numbers and addresses.

I declare under penalty of perjury that on this 2nd day of October NOV, 2015 I am delivering this complaint to prison authorities to be mailed to the Pro Se Office of the United States District Court for the Southern District of New York.

Signature of Plaintiff:

Guel Routhier



Twel Pounds Tree #34950581
G. Elmhurst, N.Y. 11370
(NYC) 09-09-Hazan 54

500 Pearl St.
Justice L.A.P.
Southern Dist. Court
N.Y., N.Y. 10007

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